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Connecticut Association  
of Directors of Health

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*Testimony in Support of Raised Bill No. 6759: AN ACT CONCERNING THE RIGHTS AND RESPONSIBILITIES OF LANDLORDS AND TENANTS REGARDING THE TREATMENT OF BED BUG INFESTATIONS.*

To the Distinguished Co-Chairs and Members of the Housing Committee  
February 17, 2015

CADH recognizes the importance of this bill and the role of local health departments in addressing bed bug concerns. As always, local health departments can and will address concerns regarding bed bug infestations and may, if indicated upon a health inspection, order a landlord to obtain an inspection by a qualified inspector.

The language in the bill includes the following definition:

*"Qualified inspector" means a certified applicator, local health department official or bed bug detection team retained by a landlord to conduct an inspection for an infestation of bed bugs.*

CADH recommends that "local health department official" not be included in this definition as to not confuse the regulatory role that a local health department may have with respect to bed bugs.

CADH also wishes to acknowledge that bed bug treatment plans must be customized by the pest control operator and may take multiple applications. Most pest control contracts will allow for up to 3 applications to eliminate the problem. The bill does state:

*No landlord shall offer for rent a dwelling unit that the landlord knows or reasonably suspects is infested with bed bugs. Before renting a dwelling unit, a landlord shall disclose to a prospective tenant whether the unit the landlord is offering for rent or any contiguous unit of which the landlord is an owner, lessor or sublessor is currently infested with bed bugs. Upon request from a tenant or prospective tenant, a landlord shall disclose the last date on which the dwelling unit being rented or offered for rent was inspected for, and found to be free of, a bed bug infestation.*

Treatment for bed bug infestations may take as long as six months. The above language does not require the landlord to disclose whether the unit being offered for rent or any contiguous unit is currently being treated for a bed bug infestation. Further, it does not require that the landlord provide written notice from a licensed pest control company stating that bed bug treatments in any contiguous units have been deemed "completed."

For municipalities that do not have a local housing code, it will fall to the local health department to enforce under the nuisance sections of the Public Health Code which poses a significant burden on local public health agencies. It is unclear from Section 2, Item b of the proposed language if every complaint of a bed bug infestation would require inspection by a municipal agency prior to a legal hearing moving forward. This provision would potentially involve local public health, placing undue stress on the limited resources within departments to investigate every case to establish legal standing.

CADH is a nonprofit organization comprised of Directors of Health from each of Connecticut's 74 local health departments. Local health directors serve as the statutory agents of the Commissioner of Public Health and ensure the provision of essential public health services at the local level in Connecticut. We work in concert with school administrators, health care providers, community and business partners to ensure the health of Connecticut residents and visitors. Thank you for your consideration.